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The Honorable Vince Chhabria
United States District Court
Northern District of California
450 Golden Gate Avenue, Courtroom 4
San Francisco, California 94102

**Re: Response in Support of Norman E. Siegel for Appointment as Lead Counsel,
MDL 2843: *In re Facebook, Inc., Consumer Privacy User Profile Litigation***

Dear Judge Chhabria:

The Court's Order seeking applications for lead counsel provided that "[t]he Court is tentatively of the view that nothing is needed by way of structure other than lead counsel." Doc. 2 at 3. There is nothing in the 30+ applications that should alter that preliminary assessment.

Consistent with the Court's guidance, I believe a single (or dual) lead counsel experienced in data privacy litigation can effectively and efficiently prosecute this case. In that regard, the applications reflect a who's-who of the Plaintiffs' Bar—well qualified lawyers all—but some with limited experience leading cases of this scale, and still fewer with deep experience representing individuals as lead counsel in data privacy litigation.

Given the size and importance of this case, lead counsel should be experienced both as an effective case manager in data privacy litigation *and* as an experienced lead trial lawyer with the ability to call upon this diverse group of qualified applicants as necessary to address the needs of the case as it progresses. If the Court determines appointment of lead counsel with these qualifications is appropriate, I believe I am uniquely suited to serve the Plaintiffs, my colleagues and the Court in this role. *See* Doc. 23.

I look forward to addressing the Court on July 18.

Respectfully submitted,



Norman E. Siegel